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**VIA ECF**

The Honorable Valerie Figueredo  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 17A  
New York, NY 10007-1312

October 4, 2024

Re: Watson v. NY DOE 2, et al. (1:19-cv-00533 (DEH) (VF)  
Joint Status Report Pursuant to Order of the Court (ECF 295)

Dear Judge Figueredo,

The undersigned counsel represent Plaintiff/Counterclaim Defendant Ralph M. Watson (“Watson”), Defendant/Counterclaimant NY Doe 2 (“NY Doe 2”), and Defendant/Counterclaimant Illinois Doe 1 (“Illinois Doe 1”) (collectively, the “Parties”) in this litigation. We write to provide the Court with a joint status update pursuant to the Court’s request on August 8, 2024 (ECF 295).

The Parties have now fully briefed their motions/cross motions for summary judgment and/or partial summary adjudication (ECF 274-284, 298-316). The Parties are currently exchanging proposed redactions on the above summary judgment documents that were provisionally filed under seal (ECF 270). The Parties then intend to meet and confer over the proposed redactions prior to submitting a letter to the Court setting forth their agreed to proposed redactions and any disputed issues on October 18, 2024.

Respectfully submitted,

/s/ Michael W. Ayotte

Michael W. Ayotte

Law Offices of Michael W. Ayotte

*Counsel for Plaintiff and Counterclaim Defendant Ralph M. Watson*

## Law Offices of Michael W. Ayotte

/s/ Laura P. MacDonald

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/s/ David J. Grech

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